

**WHITEHEAD DECLARATION**  
**EXHIBIT X**

ALISHA SINGLETON; January 31, 2019

1

1 UNITED STATES DISTRICT COURT  
2 WESTERN DISTRICT OF WASHINGTON

3  
4 STATE OF WASHINGTON, )  
5 PLAINTIFF, ) NO. 3:17-CV-05806-RJB  
6 VS. )  
7 THE GEO GROUP, INC., )  
8 DEFENDANT. )  
9 )  
10 )

11  
12 DEPOSITION UPON ORAL EXAMINATION OF  
13 ALISHA SINGLETON  
14

15 10:00 A.M.

16 JANUARY 31, 2019

17 800 FIFTH AVENUE, SUITE 2000

18 SEATTLE, WASHINGTON



24 REPORTED BY: BETSY E. DECATER, RPR, CCR 3109  
25



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1 A. Nobody.

2 Q. You don't supervise anybody?

3 A. No.

4 Q. How big is the classification department?

5 A. There are two people in there.

6 Q. Including you?

7 A. Yes, ma'am.

8 Q. Who's the other person?

9 A. Michael Heye.

10 Q. And what's his job?

11 A. Classification officer.

12 Q. Are you guys in the same job?

13 A. Yes.

14 Q. So what's the difference between you? How do you  
15 divide your work between the two of you?

16 A. We both just do it collectively.

17 Q. Michael -- is it Heye?

18 A. Heye.

19 Q. Is he on a different shift than you? Do you guys  
20 overlap?

21 A. No. He's there -- he works 6:00 a.m. to 2:30,  
22 and I am from 7:00 to 3:00.

23 Q. When was he hired?

24 A. I don't recall.

25 Q. When you started in 2006, was Michael Heye also a



1 voluntary work program?

2 A. I don't recall. That's possible.

3 Q. Do you currently manage the voluntary work  
4 program?

5 A. Yes.

6 Q. Who else works in voluntary work program?

7 A. Michael Heye.

8 Q. Anybody else?

9 A. No.

10 Q. And before Michael Heye, who managed the  
11 voluntary work program?

12 A. Me.

13 Q. Just you?

14 A. Yes.

15 Q. When you started working on the voluntary work  
16 program, did you replace anybody?

17 Like was somebody else working on the voluntary  
18 work program before you started working on it?

19 A. Probably.

20 Q. Do you know who that was?

21 A. No.

22 Q. When you applied for the classification officer  
23 position, did it include the voluntary -- did it include  
24 managing the voluntary work program?

25 A. I don't recall.



1 I haven't had to do an increase, so I'm not sure where  
2 that information comes from, how it gets to me. But my  
3 direct supervisor will let us know what's authorized in  
4 each of the areas.

5 Q. Your direct supervisor will tell you how many  
6 authorized workers in intake, in medical, in recreation,  
7 et cetera, et cetera?

8 A. Correct.

9 Q. Do you ask him whether ICE has authorized that  
10 number of detainee workers in each of those units?

11 A. No. As I previously stated, I don't ask him that  
12 question.

13 Q. For each of these jobs that you mentioned, is  
14 there a job description associated with that?

15 A. A written job description? Yes. To my  
16 knowledge, yes.

17 Q. Do you use that job description?

18 MR. PUSATERI: Object to form.

19 Q. (BY MS. CHIEN) How do you use that job  
20 description?

21 A. Can you repeat that question?

22 Q. What's the purpose of that job description?

23 A. To be in compliance with the ICE PBNDs regarding  
24 their job duties and that they have been trained.

25 Q. Is your testimony that the PBNDs requires you to



1 have a job description?

2 A. It requires the detainees to receive adequate  
3 training for the area of their responsibility.

4 Q. So does it require a job description?

5 A. It requires them to be trained. So the job  
6 description just goes over the information that they do  
7 in that particular area and then the detainee signs it.

8 Q. PBNDS requires training and the job description  
9 is a form of training for GEO; is that right?

10 A. The job description is the documentation that  
11 shows we're in compliance with the ICE PBNDS standard.

12 Q. Sorry. That didn't really answer my question.

13 I'm just trying to figure out what the purpose of  
14 the job description is, and I understand that it  
15 complies with the PBNDS. But what within the PBNDS  
16 requires you to have the job description?

17 A. That's the documentation that shows we're in  
18 compliance with the training aspect of the ICE PBNDS  
19 standards.

20 Q. But what requirement?

21 A. That they receive adequate training in that area.

22 Q. You mentioned you haven't received a request for  
23 increase in workers in a while. When you did receive an  
24 increase for workers, what was your response?

25 What did you do regarding that request for an



## REPORTER'S CERTIFICATE

I, BETSY E. DECATER, the undersigned Certified Court Reporter, pursuant to RCW 5.28.010 authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify that the sworn testimony and/or proceedings, a transcript of which is attached, was given before me at the time and place stated therein; that any and/or all witness(es) were duly sworn to testify to the truth; that the sworn testimony and/or proceedings were by me stenographically recorded and transcribed under my supervision, to the best of my ability; that the foregoing transcript contains a full, true, and accurate record of all the sworn testimony and/or proceedings given and occurring at the time and place stated in the transcript; that a review of which was reserved; that I am in no way related to any party to the matter, nor to any counsel, nor do I have any financial interest in the event of the cause.

WITNESS MY HAND and DIGITAL SIGNATURE this 12th day of February, 2019.



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